1 JOSEPH Y. HONG, ESQ. Nevada Bar No. 5995 2 HONG & HONG LAW OFFICE 1980 Festival Plaza Dr., Suite 650 3 Las Vegas, NV 89135 Ph: (702) 870-1777 Fax: (702) 870-0500 E-mail: yosuphonglaw@gmail.com 5 Attorney for POS Investment LLC 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 POS INVESTMENTS, LLC, a Nevada limited Case No.: 2:22-cv-02144-RFB-BNW liability company. Plaintiff, STIPULATION AND ORDER TO 10 EXTEND DISCOVERY DEADLINES AND TO STAY DISCOVERY v. 11 CLEAR RECON CORP., a California (FIRST REQUEST) 12 corporation; CITIMORTGAGE, INC., a Delaware corporation; DOES I through X; and 13 ROE BUSINESS ENTITIES I through X; inclusive, 14 Defendants. 15 16 Plaintiff, POS Investments, LLC. ("POS") and Defendant, Citimortgage, Inc. ("Citi"), by 17 and through their respective counsel of record, hereby stipulate and agree to extend the close of 18 discovery by ninety (90) days and to stay discovery pending the resolution of Citi's motion to 19 dismiss [ECF 33]. 20 The parties request an extension of discovery for 90 days and to the stay of this extended 21 discovery period until the Court issues its decision on the pending motion to dismiss [ECF 33] to 22 avoid incurring additional fees and costs for continued litigation while waiting for the court to issue 23 its decision on the pending motion to dismiss [ECF 33] that could be dispositive of the case. 24 25 . . . 26 27 28 1

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1	The parties agree that the foregoing proposed extension and stay are not being requested in
2	bad faith or to delay these proceedings unnecessarily. This is the first stipulation for extension and
3	the first stipulation to stay.
4	DATED this 14 th day of November, 2023.
5	
6	
7	HONG & HONG LAW OFFICE
8	/s/ Joseph Y. Hong
	JOSEPH Y. HONG, ESQ.
9	Nevada Bar No. 5092
0	1980 Festival Plaza Dr., Suite 650 Las Vegas, NV 89135
	Attorneys for Plaintiff
1	POS Investments, LLC
12	1 05 Investments, EBC
13	DATED this 14 th day of November, 2023.
4	WOLFE & WYMAN LLP
15	/s/ David T. Blake
16	DAVID T. BLAKE, ESQ. Nevada Bar No. 11059
7	6757 Spencer Street
'	Las Vegas, Nevada 89119
18	Attorneys for Defendant
9	Citimortgage, Inc.
20	
21	<u>ORDER</u>
	IT IS SO ORDERED.
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23	Dated this 15TH day of November, 2023.
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25	A cha
26	Berbucken
27	UNITED STATES MAGISTRATE JUDGE
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